



State of California

# Employment Training Panel

Arnold Schwarzenegger, Governor

August 12, 2009

Gloria Moore, Executive Director  
Community Career Development, Inc.  
3550 Wilshire Blvd., Suite 500  
Los Angeles, CA 90010

Dear Ms. Moore:

RE: FINAL MONITORING REPORT for Community Career Development, Inc. – ET07-0143

Date of Visit	08/11/09
Time of Visit	12:30 p.m. – 1:00 p.m.
Location of Visit	Teleconference
Persons in Attendance	Rhonda Rose, Business Development Manager, CCD Naomi Weingart, ETP Contract Analyst
Date of Last Visit	08/14/08
Action Required	No

## CONTRACT INFORMATION

Term of Agreement	05/01/07 – 04/30/09	Agreement Amount	\$442,440
Type of Trainee	Retrainee	Number to Retain	45
Training Start Date	05/01/07	Range of Hours	600 - 750
Date Training Must Be Completed	01/30/09 for 90-days 12/01/08 for 500 hours	Weighted Avg Hrs	750

## TRAINING STATUS

*Project Statistics from the Contractor and ETP online system:*

Trainees Started Training	70	Completed Training	15
Trainees Enrolled	15	Completed Retention	6
Dropped Following Enrollment	8	In Retention Period	0
Completed Min Reimbursable Hrs	15	New Hires Awaiting Placement	0

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ETP (04/15/05)

Training Status (continued):

This Agreement was originally approved at the September 2006 Panel meeting but subsequently given a term date beginning March 5, 2007 to coincide with the planned start of the ETP training component. However, training did not begin until May 2007, so an Amendment was processed to change the term date to May 1, 2007. In June 2008, a Technical Correction was processed to clarify the conditions under which CCD would reimburse eligible trainees for their school tuition.

Training began May 1, 2007 and ended May 2, 2008. You employed five training subcontractors: Career Development Institute (CDI); Central Nursing College (CNC); Anderson Medical Career College; East LA Occupational Center; and Marian College of Nursing. Each school provided classroom training and supervised hands-on clinical skills at different hospitals in the Los Angeles area. Trainees were recruited from the subcontractor's existing classes, and CCD staff checked employer and trainee eligibility from that trainee pool.

According to ETP online records, you were reimbursed for six trainees that completed a total of 4,485 hours; final reimbursement was made in the amount of \$62,886 or 14% of the ETP funding. Eight trainees were dropped since they were either (1) not eligible at the start of training, or (2) did not go to work for an ETP eligible employer. One trainee is still active and has been submitted to the Fiscal Unit as a "special review". Pending the outcome of that review, final earnings may be slightly higher.

Ms. Rose reported that the six trainees who finished training and retention were pleased with the program and grateful for the tuition offset. The training providers were glad to partner with CCD and ETP, and especially pleased to get some economic assistance for their students. CCD was able to build new relationships with area schools and employers, and felt that the program helped create a positive experience for schools, employers and students with local government entities. Although the CNA to LVN program was a long one, Ms. Rose said that it was a worthwhile learning experience.

Besides changing program administrators, CCD staff previously indicated that one of its biggest obstacles was determining initial employer and trainee eligibility, i.e. it was often hard to pinpoint whether or not a trainee was working precisely when ETP-funded training began, and then get the employer's CEAN. In fact, Ms. Rose said that CCD actually recruited about 100 students that appeared to be eligible, only to find that the employer did not qualify. According to the ETP Monitor, CCD's approach to the program (recruiting trainees through the schools, rather than directly contacting employers that might have a CNA population to train as LVNs for career advancement) may have contributed to the eligibility problem.

Although several trainees finished the course, passed the test, and were placed, many were employed during retention by non-ETP eligible medical facilities (i.e. non profit hospitals, doctors' offices). And, since this was a retraining program, the Agreement did not contain any new hire language allowing 10% placement with non-profits. Out of 34 employers, 12 were eligible and 22 were not. In addition, CCD staff previously commented on the difficulty of completing this program within the Agreement term due to the length of training, followed by a two- month waiting list to take the exam, possibly a 60-day wait to retake the exam if needed, a time lag getting test results, and then time needed for placement and retention. This timeline ultimately caused some trainees to finish retention outside of the Agreement term.

Training Status (continued):

Ms. Rose went on to suggest that more relaxed ETP requirements would have made CCD's efforts more successful. The biggest hurdle was that eligible employers must be overnight facilities; CCD would have had more eligible trainees and more placements if the employer population could have included skilled nursing facilities (such as adult day care) that employ LVNs with the same credentials and responsibilities as those working in other types of facilities. The second biggest hurdle was the inability to place trainees with non-profits. The Monitor reiterated CCD's option to submit "special review" invoices for the affected trainees.

Finally, Ms. Rose said that educating several outside schools in ETP and making sure recordkeeping requirements were met was difficult and time consuming for CCD staff. In all instances, the schools kept two sets of rosters - one internal and one for ETP - which was cumbersome. The Monitor said that this problem might have been avoided had the issue been discussed early on and the schools could have adapted their forms to include ETP data. Also, original rosters were kept at each school until the end of the program, which suggests that more monitoring visits should have occurred on-site at the schools.

**ATTENDANCE ROSTERS**

The Monitor reviewed faxed copies of all class/lab records for the six approved placements and found that the Training Plan was followed; the curriculum was provided as specified; and the 1:15 trainer to trainee ratio was met. Training was done by Central Nursing College: one class began July 23, 2007 and ended December 21, 2007; the other began October 15, 2007 and ended May 2, 2008. Hours were recorded on ETP multiple-day rosters, and most of the online data entry accurately matched the rosters. The following recordkeeping anomalies are discussed here for the record; no action is being taken at this time, which does not preclude other findings and/or conclusions in the event of an audit.

Instructor Signatures:

- All rosters were signed by the same instructor, Hyon S. Garcia. The two classes shared 15 overlapping training dates showing Ms. Garcia training both on the same date for either 7 hours + 5 hours (12 hours total), or 12 hours + 5 hours (17 hours total) in one day (there were no "in" and "out" times since multiple-day rosters were used).
- Although all trainees' names were pre-printed, two trainees' names were lined out, and their names and all daily initials were handwritten on a new line. It appears that the rosters were signed and initialed all at once instead of daily.

Training Hour Discrepancies:

- One trainee (Argueta) trained on 11/25/07, Thanksgiving Day, and from 4/5/8 to 4/11/08, 7 straight days. There is also a double entry for 03/01/08 for 12 hours each day, which creates a potential 12-hour, or \$168, overpayment.
- One trainee (Kang) received 12 hours on 10/29/07, but was only credited with 5 online (7 hours short); had a double entry for 7 hours on 12/03/07 (7 hours over); and a double entry for 8 hours on 12/05/09 (8 hours over) for a potential overpayment of +7 -7 -8 = 8 hours or \$112.

Attendance Rosters (continued):

- One trainee (Kim, Y.) received 12 hours on 10/29/07, but was only credited with 7 online (5 hours short); had a double entry for 7 hours on 11/30/07 (7 hours over); for a potential overpayment of  $-7 + 5 = 2$  hours or \$28.
- One trainee (Kim, G.) received 12 hours on 10/29/07, but was only credited with 7 online (5 hours short); had a double entry for 12 hours on 11/14/07 (12 hours over); received 8 hours on 11/29/07 but got credit for 3 hours (5 hours short) for a potential overpayment of  $-12 + 5 + 5 = 2$  hours or \$28.

The potential overpayment amounts to only .005 percent of earnings.

Miscellaneous Issues:

- Central Nursing College (CNC) was incorrectly entered as the Contractor, and all rosters for the October 2007 class showed an incorrect ETP contract number (ETP07-043-000).
- One roster showed training on 11/31/07 (entered online as 10/31/07, which appears to be the correct date). The date should have been corrected on the rosters.
- The last roster for the July class was dated 12/14/07 thru 12/21/07 (12/14, 12/17, 12/18, 12/19, 12/20 and 12/21), a total of 6 days, which were correctly entered online. However, the roster columns were misaligned and trainees actually signed in 7 times.
- There was only one absence for all trainees for the entire program.

In order to clarify these anomalies, the Monitoring Analyst spoke with Vanessa Astorga, Training Administrator, Central Nursing College on 7/14/09 and 7/15/09. She explained the following:

- Standard class lecture days were 8 a.m. to 3:30 p.m.; clinical days were 6:30 a.m. to 7 p.m. The July class had FT class days interspersed with 12-hour hospital days; but the October class had PT evening classes from 4 to 9 p.m. with Saturday/Sunday hospital days.
- Ms. Garcia did not train all of the classes. Susan Wood, a prior LVN program director in charge of faculty (she is no longer with CNC) taught some of the overlapping evening classes when Ms. Garcia had 12-hour hospital days. Otherwise, Ms. Garcia often taught 7-hour and 5-hour classes on the same day. Ms. Astorga does not know why the second instructor failed to sign the rosters, but stated that she has payroll records showing they worked on the days in question, even though there are no records showing which specific dates and times Ms. Woods actually taught class (the school rosters do not have instructor signatures).
- CNC kept two sets of rosters. ETP trainees signed ETP rosters daily and/or weekly, sometimes at the end of the week, based on the school sign-in sheets.



Attendance Rosters (continued):

- Two trainees (Choi and Gil) completed all ETP entries at the end of the program. They were originally ETP trainees, but because they had quit their jobs, CNC could not verify the employers' CEANs to enroll them. CCD later got the CEANs, and since the trainees completed training, got their licenses, and went to work, they were asked to sign the rosters after the fact so that CCD could invoice for them.
- When trainees were absent, they would do a makeup day, but were told to sign in on the original class date.

**AUDIT**

CCD will be notified in writing if this Agreement is selected for a field audit (conducted at your worksite) or a desk audit (conducted by telephone). Audit Notification and Confirmation letters will be sent in advance to allow ample preparation time, and will include a list of documentation that the auditor may examine. Original training attendance documentation is required; photocopied records are not acceptable. Listed below are types of records typically requested during an ETP field audit:

- Training attendance records such as rosters and sign-in sheets;
- Payroll records of individual trainees to verify wages and hours worked;
- Personnel records regarding occupations and dates of employment;
- Documentation of employer paid health benefits (if applicable); and
- Cash receipts to verify receipt and accounting of ETP funds.

**RECORD RETENTION**

Records must be retained within your control and be available for review at your place of business within the State of California. This responsibility will terminate no sooner than four (4) years from the date of the termination of the Agreement or three (3) years from the date of the last payment by ETP to the Contractor, or the date of resolution of appeals, audits, claims, exceptions, or litigation, whichever is later.

Please contact your Monitoring Analyst within ten working days at (818) 755-3633 or [nweingart@etp.ca.gov](mailto:nweingart@etp.ca.gov) if you have any questions or comments.

Sincerely,

*Signature on File*

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Wally Aguilar, Program Manager  
North Hollywood Regional Office

*Signature on File*

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Naomi Weingart, Contract Analyst  
North Hollywood Regional Office

Cc: Rhonda Rose, Business Development Manager, CCD (email)  
David A. Guzman, Chief, Audits & Program Operations Division (email)  
ETP Master File  
ETP Project File

Date report mailed to Contractor 08/17/09